

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
THE AMERICAN MEDICAL ASSOCIATION, :
et al., :

Plaintiffs,

-against-

UNITED HEALTHCARE CORPORATION, :
et al., :

Defendants. :

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: **STIPULATION AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between plaintiffs

Helene Coull, S. Joseph Domina, Colleen S. Finley, David Finley, Michael Grisham,
Susie Grisham, Edward F. Mitchell, Jr., Peter Oborski, Paul Steinberg, Sandra Taylor,
Clifford E. Wilson (individually and as executor of the estate of Michele S. Wilson),
Michael J. Attkiss, M.D., William B. Ericson, M.D., American Medical Association ,
Medical Society of the State of New York, Missouri State Medical Association, Cynthia
Falk, Mary Gilmartin, Joan Lawrence, Thomas Lawrence, Senator Toby Ann Stavisky,
Janet Stravitz, Gail Temple, Civil Service Employees Association, New York State
Police Investigators Association, New York State United Teachers, Organization of New
York State Management/Confidential Employees (collectively "Plaintiffs"), and
defendants United HealthCare Corporation, n/k/a UnitedHealth Group Incorporation,
United HealthCare Insurance Company, United HealthCare Insurance Company of New
York, Inc., United HealthCare of the Midwest, Inc., United HealthCare Services, Inc.,
United HealthCare Services of Minnesota, Inc., United HealthCare Services Corporation,

Ingenix, Inc., Metropolitan Life Insurance Company, and American Airlines, Inc.

(collectively “Defendants”) that:

1. On July 10, 2007, Plaintiffs filed a Fourth Amended Complaint (the “FAC”);
2. On September 24, 2007, Defendants filed a Motion to Dismiss All RICO, All Antitrust, and Several ERISA Claims in The Fourth Amended Complaint (the “Motion to Dismiss”);
3. On November 30, 2007, Plaintiffs filed an Opposition to Defendants’ Motion to Dismiss;
4. On January 11, 2008, Defendants filed a Reply in Further Support of the Motion to Dismiss;
5. On August 22, 2008, this Court issued an Order Granting In Part and Denying In Part Defendants’ Motion to Dismiss The Fourth Amended Complaint;
6. On September 8, 2008, the Physician Plaintiffs filed a Motion for Reconsideration of this Court’s August 22, 2008 Ruling With Respect to the Pleading of Physician Plaintiffs’ Claim for Unpaid Benefits Under ERISA (the “Reconsideration Motion”);
7. On September 25, 2008, Defendants filed an opposition to the Reconsideration Motion;
8. On October 6, 2008, the Physician Plaintiffs filed a Reply in Further Support of the Reconsideration Motion;

9. On December 22, 2008, Defendants' filed The United Defendants' American Airlines', and MetLife's Answers To Plaintiffs' Fourth Amended Complaint and Defendants' Counterclaim Complaint.

10. Plaintiffs' time to answer the counterclaim under the Federal Rules of Civil Procedures and Local Rules of the Southern District of New York has been extended thirty (30) days, which the parties calculate under the current procedure posture of the case to be March 11, 2009.

11. Further, on January 16, 2009, plaintiffs the American Medical Association, the Medical Society of the State of New York, the Missouri State Medical Association, Helene Coull, Cynthia Falk, Mary Gilmartin, Michael Graham, Susie Graham, Joan Lawrence, Thomas Lawrence, Senator Toby Ann Stavisky, Stephen Steinberg, Janet Stravitz, Eliezer Gewirtzman, Peter Oborski, S. Joseph Domina, David Befeler, M.D., Darrick E. Antell, M.D., FACS, David A. Ditsworth, M.D., the Civil Service Employees Association, New York Police Investigators Association, New York State United Teachers, the Organization of New York State Management/Confidential Employees (collectively, the "Settling Plaintiffs"), and Defendants filed a Joint Motion for Conditional Certification of the Settlement Class, Preliminary Approval of the Proposed Class Action Settlement set forth in the Agreement, dated January 14, 2009, and Approval of the Forms of Class Notice.

12. On January 30, 2009, Wilentz, Goldman & Spitzer, P.A. ("Wilentz") filed a Notice of Provisional Opposition to the Motion for Conditional Certification of the Settlement Class, and Cross-Motion for Leave to Conduct Discovery

and/or To Appoint a Discovery and Settlement Master, filed on January 30, 2009 (the "Wilentz Opposition").

13. Defendants' time to respond to the Wilentz Opposition has been extended from February 9, 2009 to February 10, 2009.

Dated: New York, New York
February 9, 2009

Respectfully submitted,



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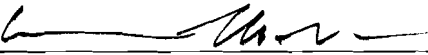
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Attorneys for Plaintiffs

SO ORDERED:

Dated this 10 day of FEBRUARY, 2009



Lawrence M. McKenna
United States District Court Judge